

October 15, 2001

Magalie Roman Sales
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 94-102
E911 / TTY Digital Deployment Quarterly Report
Third Quarter 2001

Dear Ms. Sales:

Western Wireless Corporation ("Western") and its subsidiaries listed in Attachment A, pursuant to the Federal Communications Commission's ("Commission") Fourth Report and Order in CC Docket No. 94-102, hereby files its Quarterly Report for the quarter ending September 30, 2001, detailing its current progress on the deployment of digital enhanced 911 ("E911") TTY accessibility.

Western is a provider of Commercial Mobile Radio Service ("CMRS") in 19 states west of the Mississippi River and operates under the CellularOne brand name. Furthermore, Western operates analog CMRS throughout its entire network using a platform comprised of equipment from multiple manufacturers and infrastructure providers. Additionally, Western provides digital CDMA and digital TDMA service in many of its markets.

Western understands the important responsibility of meeting the FCC requirements for wireless carriers to provide TTY access, via the 911 dialing code, over its wireless network to hearing-impaired persons. Western is engaged in detailed discussions with vendors regarding the availability of digital equipment that will support the FCC requirements. Western currently provides analog AMPS, digital CDMA, and digital TDMA wireless service in selected areas of its network, and in some cases, all three platforms are supported together in one market. Furthermore, Western's analog network is currently capable of routing 911 calls via a TTY device to a TRS provider. Its current network uses switching components from Lucent Technologies, Nortel Networks, and Motorola, and provides service to customers from a wide range of handsets and mobile devices. Additionally, its network is available to accommodate roaming traffic from a wide assortment of carriers.

Western is finishing an on-going project of adding additional digital service to its analog network. The roll out of this digital service will take place gradually over the next year, one market at a time starting with larger markets and moving towards smaller markets. The enhancement process will be complex, but sustained to bring the project to completion as quickly as possible, and may involve, in some instances, significant upgrades of entire switching platforms or the complete replacement of previously used equipment. This process will occur at different times on different manufacturers' equipment throughout different parts of Western's network. Western plans to carefully integrate the new digital equipment and products into service available to its existing analog customers. The new digital services will not completely replace analog service. Once the conversion process is finished, Western's network will still support analog service and analog phones and therefore, TTY access via the 911 dialing code. The digital service will be in addition to, and not a replacement of, its analog service.

Western has two markets where TDMA wireless service is exclusively offered to new customers. These two markets, however, still support analog service, and the delivery of TTY-911 calls. As you know, the ability of TTY devices to transmit calls over digital networks is incumbent upon the manufacturer's availability of the necessary infrastructure hardware, software, and compatible handsets. Western's discussions with its vendors indicate that some digital equipment elements are moving toward compatibility with TTY devices sooner than other elements. To the extent that these products, services and necessary infrastructure supplies are not widely available on the market, Western will have no access to equipment to upgrade the portions of its network that provide digital service which are capable of meeting the Commission's TTY requirements. The delivery of these products and supplies to Western will be critical in order for it to meet the Commission's deployment deadline on its digital network. Western must be able to not only receive these products, but must also have time to install, test and troubleshoot them before they can be made available for use upon its network. Western continues to coordinate this process with its manufacturers and infrastructure providers. Nevertheless, even during these times of digital conversions and digital equipment preparation, Western's network will continue to support analog service and TTY access to 911 emergency services.

As you know, accessing a TRS answering center via a TTY device dialing 911 over a digital network requires a complicated system of detailed network integration and coordinated testing of switches and handsets. When the necessary TTY equipment becomes available, Western will begin installation and testing on its network. The specific timeframe and procedures for these tests are currently unknown and directly related to the technical specifications of the customer equipment being developed by a variety of manufactures. Some may require detailed testing and separate implementation timelines. A specific timeline for testing this equipment is incumbent upon Western completing its installation of digital equipment, and it is also subject to the availability of the

network infrastructure by manufacturers supplying products to Western. The availability of products from other companies, including equipment vendors, is outside of the control of Western. Because of this situation, Western can only pledge to continue making progress with its own network modifications, and that it will continue to pursue the availability of TTY compatible products for its digital network. Until the completion of those two events take place, Western will continue to provide TTY service over its current analog network.

In conclusion, Western will continue to move towards compliance with all aspects of the Commission's Fourth Report and Order. Furthermore, it will continue to provide access to TTY services via its existing analog network, and as larger areas of Western's network begin to offer digital services to the public, and as digitally compatible TTY products and infrastructure are available on the market, Western will seek out these products and develop a detailed timeline for the installation, testing and implementation of digital TTY services capable of meeting the Commission's technical requirements by the June 30, 2002 deadline. Lastly, Western will continue to provide the Commission with Quarterly updates as to the status of its progress, and if necessary, may seek a waiver of the applicable requirements if the necessary equipment does not become available in sufficient time to allow Western to meet the implementation deadlines.

Respectfully Submitted,

Nathan Glazier
Regulatory Specialist

Attachment A

Western Wireless Corporation Subsidiaries

WWC Holding Co., Inc.
WWC License L.L.C.
WWC Texas RSA L.P.